

# Exhibit K

**Saxton, Kate**

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**From:** Craig Allison <callison@bdiplaw.com>  
**Sent:** Friday, June 21, 2013 7:31 PM  
**To:** Saxton, Kate; BDSACoreWireless  
**Cc:** WH Apple-Core Wireless External; Mukherji, Proshanto  
**Subject:** RE: Core Wireless v. Apple

Kate, we are in the process of finalizing our cites to intrinsic and extrinsic evidence. We will send you Core Wireless's final version of the joint claim construction statement Exhibit 1 as soon as we can. We are hoping to get that to you within the hour.

In the interim, I wanted to let you know where we stood on your counter-proposals for the '860 patent, since that might affect how Apple handles its part of Exhibit 1 for the '860 patent. Core Wireless has come to the conclusion that the parties have not yet been able to come to a sufficient meeting of the minds to justify the compromise positions Core Wireless has proposed. We believe there is good support in the specification for an interpretation of the means elements to include more than just a SIM card. As a compromise, we had proposed limiting the structure to an "intelligent module SIM" in the hopes of getting agreement on many or most of the MPF terms in the '860 patent. Unfortunately, so far, we have only been able to get agreement on two very similar terms, and agreement continues to elude us with regard to the rest. The deadline this afternoon precludes more substantive discussion on this issue.

For these reasons, instead of using our compromise phrase "intelligent module SIM 140," we intend to use the phrase "intelligent module (such as a smart card or SIM)."

Although we have not yet been able to reach agreement, Core Wireless believes that this filing is not necessarily the end of discussions between the parties on this and other claim terms, and we believe we should continue to discuss compromise during the briefing process. We are hopeful that the parties will be able to reach agreement on additional terms before the briefing is completed.

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**From:** Saxton, Kate [<mailto:Kate.Saxton@wilmerhale.com>]  
**Sent:** Friday, June 21, 2013 11:12 AM  
**To:** Craig Allison; BDSACoreWireless  
**Cc:** WH Apple-Core Wireless External; Mukherji, Proshanto  
**Subject:** Core Wireless v. Apple

Craig-

Attached are counterproposals from Apple regarding the 860 patent. Please let us know if Core Wireless is agreeable to these proposals. We are available if Core Wireless would like to discuss.

Regards,

Kate